

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MICHELLE E. LATTIMER)
Plaintiff,)
vs.) Civil Action No. 05-11072RCL
HALLMARK HEALTH SYSTEM, INC.)
Defendant.)

**JOINT MOTION FOR ADDITIONAL TIME TO
COMPLETE FACT DISCOVERY**

Plaintiff Michelle E. Lattimer ("Plaintiff") and Defendant Hallmark Health Systems Inc. ("Hallmark") (collectively "the parties") hereby request that the Court extend the time by which the parties may complete fact discovery until September 30, 2006. The parties further request that the Court extend the time by which they may submit dispositive motions up to and including November 31, 2006.

In support of this motion, the parties state that they need additional time to schedule depositions, conduct interviews, and that they continue to explore possible settlement.

WHEREFORE, Plaintiff Michelle E. Lattimer and Defendant Hallmark Health System, Inc. request that this Court grant their motion to extend the time in which they may complete fact discovery and submit dispositive motions up to and including September 30, 2006 and November 31, 2006 respectively.

Respectfully submitted,

Michelle E. Lattimer
By her attorney

/s/ Pamela J. Coveney
Pamela J. Coveney, BBO # 107280
Disability Law Center
11 Beacon Street, Suite 925
Boston, MA 02108
(617) 723-8455
(617) 542-6789

Hallmark Health System, Inc.
By its attorneys

/s/ John Simon
Kay H. Hodge, BBO # 236560
John Simon, BBO # 645557
Stoneman, Chandler & Miller, LLP
99 High Street
Boston, MA 02110

June 6, 2006